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12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

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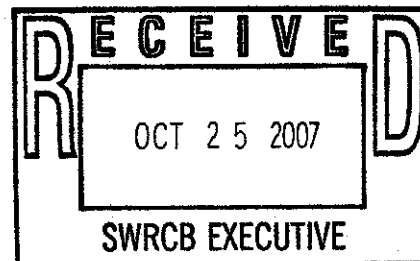
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MICHAEL R. MARKUS
General Manager

ORANGE COUNTY WATER DISTRICT

Orange County's Groundwater Authority

October 25, 2007

Tam M. Doduc, Chair, and Members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Attention: Jeanine Townsend, Acting Clerk to the Board



Subject: Comment Letter - Water Recycling Policy

Dear Chair Doduc and Members of the Board:

The Orange County Water District (OCWD) appreciates the opportunity to provide comments on the proposed Water Recycling Policy released by the State Board in September 2007.

OCWD is both a water recycler and a downstream agency that is potentially affected by recycling upstream. OCWD operates a 7.5 million gallon per day (mgd) water recycling project for irrigation and industrial water users. Starting in November 2007, OCWD will operate a 70 mgd water recycling project for control of seawater intrusion and groundwater recharge.

OCWD manages the Orange County Groundwater Basin, which is located at the lower end of the Santa Ana River Watershed. In the upper part of the watershed, several agencies engage in water recycling activities. OCWD has a long history of working together with these agencies and the Santa Ana Regional Board so that the upstream water recycling projects do not negatively affect downstream beneficial uses. A significant amount of this coordination has focused on managing salts in the watershed. Collaborative, watershed-wide management efforts, together with the brineline called the Santa Ana Regional Interceptor, are keys to the success of this consensus-based program. The results of the watershed-wide management efforts are included in the Basin Plan for the Santa Ana Region and constitute an existing implementation plan for salt management. The implementation plan also includes an extensive monitoring program.

OCWD provides the following comments on the Water Recycling Policy:

1. Since the Santa Ana Region is already implementing a detailed salt management plan, the Water Recycling Policy should acknowledge the Santa Ana Region's implementation plan;
2. The Water Recycling Policy should not supercede or preclude the existing implementation plan in the Santa Ana Region;
3. Irrigation and groundwater recharge projects using recycled water in the Santa Ana Region should be implemented in accordance with the salt implementation plan already in place, or amendments to that plan completed through the Basin Plan amendment process.
4. The following change in the proposed Water Recycling Policy resolution number 9 is suggested:

9. A Regional Water Board shall not require for recycled water irrigation projects salt management measures other than those listed in paragraph No. 7 prior to January 1, 2018, unless such measures are part of a salt implementation plan adopted pursuant to paragraph No. 6. The salt management plan in the Basin Plan for the Santa Ana Region is acknowledged as an existing implementation plan. Irrigation and groundwater recharge projects using recycled water in the Santa Ana Region should be implemented in accordance with the Santa Ana Region's existing plan or amendments to that plan completed through the Basin Plan amendment process.

We would like to thank the State Board and the State Board staff for engaging in a policy discussion regarding water recycling. Increased water recycling plays an important role in meeting California's water needs. Water recycling can make a significant contribution to satisfying the state's water needs and water recycling's role can be achieved while protecting the quality of the waters of the state.

Sincerely,



Michael R. Markus, P.E.
General Manager

cc: Mary Grace Pawson/Winzler & Kelly Consulting Engineers
Roberta Lawson/Somach, Simmons & Dunn
Rich Atwater/Inland Empire Utilities Agency
Jerry Thibeault/Executive Officer, Santa Ana Regional Board